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July 1, 2025

BY E-MAIL and ECF

Honorable Jed S. Rakoff
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007
RakoffNYSDChambers@nysd.uscourts.gov

Re: *G&A Strategic Investments I LLC, et al. v. Petroleos De Venezuela, S.A., et al.*,
No. 23-cv-10766 (JSR), and related cases

Dear Judge Rakoff:

We write on behalf of Plaintiffs G&A and Girard Street.¹ Pursuant to Your Honor's order, Plaintiffs respectfully submit the below proposed damages figures to be included in final judgments in connection with Your Honor's June 25, 2025 grant of summary judgment in Plaintiffs' favor as to Counts I and II of the Complaints.²

¹ Terms used but not defined herein shall have the same meaning as defined in Plaintiffs' Consolidated Memorandum of Law in Support of Their Motion for Summary Judgment, *G&A Strategic Investments I LLC v. Petroleos De Venezuela, S.A.*, 23-cv-10766 (JSR), ECF 201.

² See *G&A Strategic Investments I LLC v. Petroleos De Venezuela, S.A.*, 23-cv-10766 (JSR), ECF 247.

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Case No. 23-cv-10772-JSR, Case No. 24-cv-04448-JSR (Consolidated with Case No. 23-cv-10766-JSR)			
Note	Principal	Total With Interest as of 7/2/2025³	Per-Diem Pre- and Post- Judgment Interest
HAL Note	\$175,000,108.08	\$286,746,067.50	\$40,753.45

Case No. 23-cv-10766-JSR			
Note	Principal	Total With Interest as of 7/2/2025	Per-Diem Pre- and Post- Judgment Interest
SLB Notes	\$700,000,007.16	\$1,233,761,225.49	\$189,488.91

In light of Plaintiffs' entitlement to judgment on the Notes in the amounts listed above, Plaintiffs respectfully request that the Court direct entry of final judgment in Plaintiffs' favor for said amounts with the per-diem interest amount continuing for each day post-judgment until the judgment is satisfied.

Respectfully submitted,

/s/ Jay B. Kasner

Jay B. Kasner

cc: All counsel of record via ECF
 Encl.

³ Pursuant to Your Honor's instructions, Defendants have one day to respond to the instant request. Plaintiffs' proposed figures are therefore calculated as of tomorrow's date, July 2, 2025, to factor in such time for response.